EXHIBIT A

Periodic Review Evaluation

Periodic Review Work Program

July 31, 2008

Purpose

City Council adoption of a periodic review evaluation and work program initiates major updates to Portland's Comprehensive Plan in the areas of economic development, needed housing, public facilities, transportation, and urbanization.

On July 8, 2008 the Portland City Planning Commission, after two public hearings and the consideration of comments from interested individuals and agencies, recommended that the Portland City Council adopt both an evaluation determining that updates to the Comprehensive Plan are necessary, and a work program describing update tasks. The Planning Commission also recommended that a special committee be established to oversee the development and proper application of public engagement standards and practices.

The adopted evaluation and work program will be submitted to the Director of the Oregon Department of Land Conservation and Development for state approval. The public engagement program is a discrete task within the periodic review work program, which will also be submitted to the state Citizen Involvement Advisory Committee for their recommendation.

Any decision of the Director to approve a work program task is a final decision. A decision not to approve a periodic review work program task may be appealed to the Oregon Land Conservation and Development Commission. A decision to appeal to the Commission, or a decision to make substantive changes to the submitted evaluation or work program, would require further Council authorization.

Part One: The Evaluation

Introduction

On November 13, 2007, Portland entered its second "Periodic Review." Periodic reviews are mandated updates of state-approved comprehensive plans. Portland received state approval of its first Comprehensive Plan in May 1981, and the first periodic review of the plan was completed in January 2000. Further reviews are initiated every five to seven years and must be completed within three years of state approval of a work program.

This evaluation employs the term "comprehensive plan" broadly to include not only the Comprehensive Plan proper, but also plan supporting documents, and plan implementing measures. The actual contents of Portland's Comprehensive Plan are limited to goal, policy

and objective statements; maps; and project lists. Examples of plan supporting documents include population and employment forecasts, natural resource inventories, and public facilities plans. These documents contain the assumptions, facts and reasons supporting the decisions documented in the plan. Implementing measures carry out decisions described in the plan. Examples of implementing measures include our zoning map and code, urban renewal programs, transportation projects, and housing tax abatement programs. All of these may be subject to periodic review.

There are two phases in periodic review. Phase one involves a self-evaluation to identify any needed work. There are two possible phase one products: a determination that no work is needed, or a locally-adopted work program identifying necessary work. Phase two is completing identified work. Should the state agree with a local decision that no work is needed, there is no phase two. The Planning Commission has identified needed work and recommends that an evaluation and work program be submitted to the state. Should Portland receive approval of a work program, the likely approval would be in October or November of 2008, so the City of Portland might have until December 2011 to finish all the tasks listed on the work program.

The Broader Context

Periodic review tasks are limited to state mandated updates. The city is also considering a larger update to the Comprehensive Plan and Central City Plan, responding to community values expressed in the VisionPDX project. This larger effort could include many beneficial changes not required by state planning law.

For Bureau of Planning project management purposes it makes sense to merge the mandated and the beneficial-but-not-mandated elements into a single scope of work; but our state partners have requested maintenance of a separate periodic review work program. This separate program is Part Two of this document.

State Evaluation Requirements

The state evaluation method involves the application of Periodic Review "need" factors to certain, but not all, plan elements.

The Factors

There are four factors that indicate the need for Periodic Review.

1. Changed Circumstances

A substantial change in circumstance indicates a need for Periodic Review. These changes include the factual base, assumptions, reasons, and conditions that support a plan or implementing measure. This information is usually found in a background document rather than the plan itself. Changes become "substantial" when they can no longer support a reasonable conclusion that a requirement of state planning law has been met.

2. Inconsistencies between Plans and Decisions

It is possible that while the text of plans or implementing measures continue to comply with state planning law, decisions carrying them out may not. A pattern of land use decisions at variance with state planning law may indicate a need for periodic review.

3. Need to Coordinate

The municipal boundaries of the City of Portland contain land in three counties, while Portland surrounds one city and adjoins several others. All these local governments have plans. Metro, our regional government, state agencies, and some special districts have plans too. It is possible for all these plans to comply with state planning law, but not be coordinated with one another. Part of Periodic Review is giving other governments information about Portland's plan; and providing them opportunities to identify coordination needs.

4. New Mandates

When plans continue to be well founded, implemented, and coordinated and still not achieving some of the purposes of state planning law; the usual reason is the state law has changed. Part of periodic review is comparing new mandates to existing plans. New mandates are usually found in the Oregon Revised Statutes (usually in Chapter 197 but occasionally in other chapters as well), amendments to existing Statewide Planning Goals, and in administrative rules carrying out these goals (OAR Chapter 660).

The Elements

There are five plan elements subject to evaluation. In its earlier form, Periodic Review addressed the subject matter of all 19 Statewide Planning Goals, but the Oregon Legislature has since limited the scope of periodic review evaluations to just five topics.

1. Economic Development

The state requirements are in Statewide Planning Goal 9 and Oregon Administrative Rules, Chapter 660, Division 9. The companion Portland provision is Comprehensive Plan Goal 5.

2. Needed Housing

The state requirements are in Oregon Revised Statutes Chapter 197, Sections 295 through 314 "Needed Housing in Urban Growth Areas," Statewide Planning Goal 10, and Oregon Administrative Rules, Chapter 660, Division 7. The companion Portland provision is Comprehensive Plan Goal 4.

3. Public Facilities

The state requirements are in Statewide Planning Goal 11 and Oregon Administrative Rules, Chapter 660, Division 11. The companion Portland provision is Comprehensive Plan Goal 11.

4. Transportation

The state requirements are in Statewide Planning Goal 12 and Oregon Administrative Rules, Chapter 660, Division 12, with a special rule for Airport Planning at Division 13 which carries out Oregon Revised Statutes, Chapter 636, Sections 600 through 630. The companion Portland provision is Comprehensive Plan Goal 6.

5. Urbanization

The state requirements are in Statewide Planning Goal 14 and Oregon Administrative Rules, Chapter 660, Division 24. The companion Portland provision is the Comprehensive Plan Map. Other urbanization provisions are divided among Comprehensive Plan Goals 1, 2, 3, and 12.

Evaluation Methods

A Periodic Review evaluation is based on information on hand. A city is not supposed to do new research or fact finding in an evaluation. Discovering the city only has outdated information indicates a need for Periodic Review. Getting the better, more current or more forward-looking information would then become a Periodic Review work task.

A plan update is often compelled by more than one need factor. An example would be the construction of a better natural resource inventory. This work could be identified as "needed" either by mandate or coordination factors, and by either regional Metro Functional Plan requirements or by state goals requiring current inventories of housing and employment land. Since the same work can be indicated by five or six different reasons; this evaluation focuses on more on the indicated work rather than the underlying reasons.

That said; most of the required work recommended by the Planning Commission was indicated by the first need factor, "Changed Circumstances," and some from the last, "New Mandates." As the city acquires more forward looking information in the second phase of Periodic Review, this information will compel further examination of existing plan provisions and implementing measures, but will not necessarily require changes.

A New Public Engagement Program

The first indicated work is a new public engagement program.

Although only Statewide Planning Goals 9 - Economic Development, Goal 10 - Housing, Goal 11 - Public Facilities, Goal 12- Transportation, and Goal 14- Urbanization are the subject matter for Periodic Review, the city cannot address these goals without also meeting certain procedural requirements described within Statewide Planning Goal 1 - Citizen Involvement, and Goal 2 - Planning.

Portland is required to use its existing state-approved citizen involvement program when beginning Periodic Review. This program is Goal 9 (citizen Involvement) of our Comprehensive Plan. This goal is carried out, in part, by the "Legislative Procedures" chapter of our zoning code. These provisions incorporate state public record and open meeting requirements, provide minimum 30-day notice of public hearings, and minimum 10-day availability of documents before a hearing. This 10-day document availability period falls short of a 21-day requirement for some stages described in the state Periodic Review rule (OAR 660-25).

Newer and better public involvement tools have been developed as part of Bureau Innovation Project 1 "VisionPDX;" Bureau Innovation Project 8 "Community Connect," and Bureau Innovation Project 9 "Public Involvement Toolkit." These programs have informed the Planning Commission's recommendation for a new Community Involvement Advisory Committee and a new Public Engagement Program. The committee would be composed of no more than three members of the Planning Commission and at least nine other community members nominated by the mayor and confirmed by City Council. This program would be the "citizen involvement"

program" for the purpose of periodic review. Please see Exhibit B for a description of the public engagement program.

Updated Land Inventories

The city cannot perform the "buildable lands" analyses required by Statewide Planning Goal 9 - Economic Development, and Goal 10 - Housing, without revisiting some requirements of Statewide Planning Goal 5 - Natural Resources, and Statewide Planning Goal 7 - Hazards.

This work requires the construction of an inventory of "buildable lands." An analogy to a photographic positive and negative is a good way to understand this work. The negative is a compiled inventory of constrained areas, usually natural resource areas and hazardous sites. Whatever is left unconstrained is the positive, the buildable lands inventory. The list of inventoried features suggested by state agencies and identified by city staff are included in Part Two of this document.

The Planning Bureau has also discussed the problem with Metro and DLCD that the term "buildable lands inventory" is misleading because it implies that land not included on the inventory is not buildable. This is not the case. Most land not included on buildable land inventories can be developed; but is often subject to extra scrutiny at the time of development. There are, however, some categories of land may not allow any building.

To avoid this confusion our state and regional partners have concurred in a proposal that the city be mapped in three parts: unconstrained, constrained, and highly constrained. This map could either be a background document for the Comprehensive Plan, or part of the plan itself. The purpose of the unconstrained portion of the map would be a demonstration that a sufficient supply of housing and employment opportunities could be met on what the sate calls "buildable" lands.

Updated Economic Development Element

The last major update of the Economic Development Element of Portland's Comprehensive Plan was completed in September 1994. The Planning Commission recommends revisiting background information on economic trends and opportunities; and a re-examination as to whether sufficient buildable land is available to accommodate different categories of expected and desired employment types. There are also new state Goal 9 provisions regarding short-term land supply, prime industrial land, and brownfield redevelopment that the city has yet to address.

Metro conducts a population and employment forecast for the entire metropolitan region and apportions the forecast to each of the constituent jurisdictions with comprehensive planning responsibilities. Portland's responsibility is to demonstrate that it has sufficient quantities of vacant, re-developable, or underutilized commercial and industrial land in the right places, with supporting infrastructure, to accommodate a 20-year need identified by Metro. The city, at its discretion, may choose to accommodate a greater than 20-year need. Indicated work includes:

1. <u>Economic Opportunities Analysis</u>. A new Economic Opportunities Analysis will be required to update Goal 6 of the Comprehensive Plan - Economic Development element of the Comprehensive Plan. A state grant may be available to underwrite part of the cost of this analysis. Any new Economic Opportunities Analysis should be

- adopted by both the Portland City Council and the Portland Development Commission, probably as a Comprehensive Plan background document.
- 2. <u>Trends analysis</u>. The city does not have a current analysis describing international, national, state and local economic trends related to the types of business likely to locate or expand in Portland. Metro's current 2030 forecast is based on trends analysis, but a closer look at Portland trends and conditions could warrant forecast refinements
- 3. Identification of Industrial Land Base. A citywide industrial land analysis was completed in 2004, but not adopted by City Council. This analysis included inventories of buildable vacant land, and various tiers of use constraints, such as brownfields, environmental constraints, and infrastructure deficiencies. Updates of these inventories should incorporate recent development and investments that have occurred in Portland. Short-term land supplies (e.g., 3, 5, or 8 years) have not been specifically inventoried. The city should consider the cumulative effects of rezoning and identify the amount of growth or shrinkage of the industrial land base since the completion of the last Periodic Review in 2000. The revised land base should be categorized as suitable for different employment types in the city's range of employment districts.
- 4. Prime Industrial Land and Land Retention Measures. New provisions in Statewide Planning Goal 9 (Economic Development) on "prime" industrial land are applicable in Portland. There are lands that have marine, rail, air, or highway access and other supportive infrastructure that would be difficult or impossible to replace. Portland must also comply with provisions of Title 4 of Metro's Urban Growth Management Functional Plan that require more limits of the use of industrial lands by commercial activities than does Portland's industrial sanctuary regulations.
- 5. Other Employment Land. Portland must also assess the adequacy of its land base for non-industrial employment. Land supply and demand analysis should consider any need for expanding urban centers, commercially underserved neighborhoods, and institutional land needs (e.g., hospitals and universities).
- 6. Accommodation of Identified Employment Needs. Every five to seven years Metro adopts a regional 20-year population and employment forecast, and makes a growth management decision. This decision may direct growth within the existing urban growth boundary, to new urban areas requiring an expansion of the boundary, or to both types of areas. The Metro Council then allocates a share of expected growth to each city within the metropolitan region and to urban unincorporated areas in three counties. These allocations are recorded in Title 1, Table 1 of Metro's Urban Growth Management Functional Plan, which was last updated in December 2002. Portland should review its employment capacity to determine if this target can be met plus an increment expected to be allocated by Metro in 2010. One of the difficult parts of periodic review will be starting without a new, regional, coordinated employment forecast. Portland planners will work with Metro staff to refine regional capacity estimates, which in turn, should influence the next regional growth management decision. The Portland Planning Bureau assumes that a demonstration that the city has capacity to either meet or exceed the expected employment allocation would satisfy state planning law; but a demonstration of insufficient capacity would not. This accommodation analysis is done for the city as a whole.

- 7. Policy and Map Adjustments. Depending on what the city learns from the above, the City Council may choose to adjust policies, maps, and codes that describe a desired distribution on employment opportunities throughout the city.
- 8. Economic Development Strategies. The Oregon Business Plan (2007) and Regional Business Plan (2006) focus on supporting traded sector clusters, some of which have a substantial presence in Portland. Portland's 2002 Economic Development Strategy recommends a range of actions that reinforce local competitiveness in these sectors. The Economic Development Strategy is expected to be updated concurrently with the Comprehensive Plan update, facilitating coordination of long-term policies and short-term priorities for economic development.

Updated Housing Element

The Housing Element of Portland's Comprehensive Plan was last revised in January of 1999. Periodic review requirements address the city's overall housing capacity, the variety of housing types allowed, and the provision of needed housing.

The update of the Housing Element indicates the following work:

- 1. Forecasted Housing Need. As with employment, Metro will prepare a twenty-year population forecast for the entire metropolitan region. A regional housing need will be derived by dividing the forecast by an expected future household size; and a future housing need will be allocated to each city under Metro's jurisdiction, as well as to the unincorporated urban areas of the three metropolitan counties. This allocation will update or replace the Portland housing number in Title 1, Table 1 of Metro's Urban Growth Management Functional Plan.
- 2. Calculation of Housing Capacity. Portland is facing similar but different capacity requirements from Metro and the State. Metro will require that Portland have the capacity to at least meet its assigned 20-year allocation of additional housing. The state's "Metropolitan Housing Rule" requires that Portland accommodate (existing plus new) 10-units-per-acre on the residentially-zoned portion of its buildable lands inventory. During its first Periodic Review Portland fell slightly short of this number; but the state rule has been subsequently amended to recognize that mixed-use zones provide housing capacity too. Portland has established minimum housing densities for all its residential zones; but not for residential projects allowed by right in commercial and employment zones. Minimum residential densities for mixed-use projects might be indicated by the capacity analysis.
- 3. <u>Different Housing Types</u>. The state requires at least half of Portland's remaining housing capacity be designated for multi-dwelling and attached single dwelling use. Portland will have to perform a "needed housing" examination, profiling existing and expected residents and the amount of housing affordable for different brackets of household income. The state rules assume that denser housing is more affordable housing, but this is not necessarily the case in the center of a metropolitan region. The cost of land plus the costs of construction makes market-rate new housing unaffordable to many. Also, given the rise in transportation costs due increased fuel prices, the affordability of housing is affected by both housing costs and location. The city may choose to mitigate this situation by considering housing and transportation costs together, as measured from distance to job centers, when determining housing

affordability and affordable housing locations. Indicated work includes identifying patterns of housing, transportation, and services that provide for more affordable living. These patterns are often called "twenty-minute neighborhoods."

- 4. Conservation of Needed Housing. Portland has an existing policy and code that preserves the housing potential of the city as a whole, and has long term affordability agreements with some housing providers. The city will have to perform analysis of any housing potential lost and gained since the last Periodic Review. An assumption behind the city's "no net loss" housing policy is that housing needs and accommodation are fairly ubiquitous, that is, housing lost in one part of the city can be satisfactorily replaced in another; and that one form of housing can be replaced by another. This assumption may not be bearing out. Indicated work includes more refined housing conservation measures. Examples of conservation measures that might be considered include limitations on the conversion of for-rent apartments to for-purchase condominiums, the replacement of smaller houses with larger ones, permanent affordability requirements for housing receiving deep public subsidy, and more extensive "inclusionary" housing policies. The city might also consider the adoption of additional accessibility requirements to meet the needs of those with mobility limitations and allow aging in place.
- 5. Regulatory Barriers. Portland already amended its code definition of "household" to meet federal fair housing requirements, and to remove barriers to the provision of various forms of needed housing. The city has also amended its code to provide a "two-track" process for the review of the design of residential building. One track provides a quick review though application of prescriptive standards; while the other provides a longer, but more flexible, approval through the application performance-based standards. While all state requirements have been met in this area, the city will certainly consider additional opportunities to provide more needed housing though adjustments in the development review process. The city might also consider an evaluation of regulatory barriers in our zoning and other City codes to the development of new attached and multifamily housing types designed to provide needed housing. An example is courtyard housing designed for families with young and school-aged children.

Updated Transportation Element

The Transportation Element is the most up-to-date part of our Comprehensive Plan. Regular updates are required to preserve eligibility for certain types of federal funding. The Transportation Element was last revised in April of 2007. This element includes, but is not limited to:

- 1. Maps designating the functional classifications and design types of various transportation facilities,
- 2. Policies that apply citywide or by transportation district, and
- 3. A list of authorized transportation projects.

As projects are funded they must be selected from the list. If a desirable project is not on the list, the Comprehensive Plan must be amended to include it before it can be funded. Although listed projects often include a cost estimate, project cost, timing, and engineering details these

characteristics of projects are not "land use decisions" within the meaning of state law and are thus matters subject solely to the discretion of the Portland City Council.

The Oregon Land Conservation and Development has adopted a Transportation Planning Rule and an Airport Planning Rule. Portland's plans and land use regulations have been recently "acknowledged" as meeting the requirements the Transportation Rule and no new mandates have been established since the 2007 acknowledgement. Acknowledgement means the state Transportation Rule applies when Portland chooses to change a plan, zone, or regulation; but nothing in this rule compels a change.

Portland was not required to consider the Airport Planning Rule in its first Periodic Review, so must do so now. Fortunately the city has already adopted the types of regulations required by the rule, but these may have to be adjusted based on more current information and particular provisions of the Airport Rule. The planning provisions of the Airport Planning Rule have not been fully addressed.

Indicated work includes:

- Airport Planning. The existing airport (perhaps a simplified version of the airport layout plan) and proposed airport expansion areas must be depicted as public facilities within Portland's Comprehensive Plan. This will be accomplished as part of the pending Airport Futures project.
- Airport Associated Regulations. The Portland zoning code already provides special height limitations, noise contours, and use restrictions for airport approaches and departures. These need to be examined and possibly updated based on newer information, changing technology, and airport expansion plans. This will be accomplished as part of the pending Airport Futures project.
- 3. <u>Future of the Portland Heliport</u>. A long-term agreement to use the top deck of the Old Town parking garage as a heliport has recently expired. The city is now the fee owner and operator of the heliport. Continued use of the garage as a heliport might conflict with desirable future development near the garage. During the course of periodic review the city will need to make a choice discontinue operations, continue operations and limit building height in designated approaches, or designate an alternative site without building height conflicts.
- 4. <u>Oregon Highway Plan Coordination</u>. Portland's Transportation Element is coordinated with the state plan with one possible exception. The state plan has been recently amended to require "special transportation areas" for state highways that serve as main streets for urban centers. The city needs to examine its plans to see if the state requirements have been accommodated by existing provisions.
- 5. <u>Regional Transportation System Plan</u>. Metro will adopt a new regional plan in 2009. Portland will have one year to adopt any necessary conforming amendments.
- 6. <u>Bicycle and Streetcar Master Plans</u>. While these are not part of the Comprehensive Plan *per se*, certain plan provisions might have to be amended to carry them out. Examples of likely amendments include functional street classification changes to "transit" for new streetcar routes and the addition of projects to the plan list. The city might also consider modal preferences as part of its overall street classification policy.

7. <u>Service Standards</u>. Portland like most other North American cities uses a "level of service" standard to rate the movement of vehicular traffic. This measure was devised for sizing new facilities in newly urbanizing areas, and thus provides less value in more mature areas. Portland, in concert with a similar effort at Metro, should consider adoption of a multi-modal mobility service standard for higher density mixed-use areas served by several types of transportation.

Although not directly tied to a Periodic Review need factor, the Oregon Department of Transportation, Region 1, has asked the city to review its procedures against two parts of the Transportation Planning rule.

8. City methods for determining a "significant affect" under the Paragraph 0060(1) of the state Transportation Planning Rule. Whatever the city's service standard might be, the State Transportation Planning Rule requires an examination of traffic generation potential as a part of any proposal to change a plan, land use regulation, or zone. If the proposed change generates less traffic than the existing provision, no further examination is required. If more traffic is generated, it is possible that a service standard could be violated, and this would be a "significant affect" under the state rule. Oregon Department of Transportation staff has asked the city to describe, standardize, and formalize a method for determining a significant affect that employs a "reasonable worst case" applied with parity to the base case and the proposed case, or cases. These cases should employ 20-year horizons, and pay particular attention to effects on interchange areas.

Although the city would prefer an alternative to the term "reasonable worst case," the Planning Commission concurred that a better and standardized method is needed for determining a significant transportation effects, particularly effects on state and regional facilities. Employment of a standard method of analysis is an implicit requirement of indicated periodic review work, and while it would be better if approved methods resided in state rules, no such guidance exists.

The city has no standard trip generation assumptions for changes from one land use category to another. When a zone change is proposed (see for example Portland City Code 33.855.050 B 2, Approval Criteria for Base Zone Changes) reviewers have a choice of just examining the trip generation effects of a particular development proposal, even when that proposal greatly underutilizes the development potential of the requested zone. At the other extreme, reviewers are also free to examine the traffic generation effects of maximum utilization of a zone; even though some degree of underutilization is common. The Oregon Department of Transportation's "reasonable worst case" suggestion is based on probable utilizations of various zones within a twenty-year planning horizon. This would model a high, but not maximum, rate of traffic generation. The Bureau of Planning recommends that the development of an analytical method along the lines suggested by the Oregon Department of Transportation be included in the periodic review work program.

9. <u>Notification</u>. Oregon Department of Transportation, Region 1, has also asserted that Portland should comply with Section 0045(2) of the state Transportation Planning Rule by notifying the state of pending building permits for sites adjoining state facilities.

It is the city's practice to not issue a permit for a lot or parcel adjoining a state facility that would provide new access, or increased utilization of an existing access, to that state facility unless and until the permit applicant obtains the necessary state permit. If this arrangement is proving ineffective, the city is open to clarifying and improving coordination in a letter of agreement. It is

the Planning Commission's recommendation to not recognize this cooperation as a periodic review requirement.

Updated Public Facilities Element

This part of the plan describes the services the city is obligated to provide, sets service standards for city provided services, recognizes external mandates for safe drinking water and pollution control, and contains capital project lists necessary to support growth described and allowed by the Comprehensive Plan. The last major revision was in April 1989 when a list of capital projects was added to the plan to comply with the then new state Public Facilities Rule. Only the transportation projects on this list have been kept current through state "post-acknowledgement plan amendment" procedures.

The following work is indicated:

- Asset Management. An evaluation of existing capital assets in good, fair, and poor condition, a estimate of the costs of maintaining these assets, and an estimate of funding, and fund sources, likely to be available for maintenance.
- 2. <u>Facilities Supporting Growth</u>. Identification of new facilities and existing facility upgrades necessary to support new development described and allowed by the Comprehensive Plan with an estimate of funding, and fund sources, likely to be available.
- 3. External Mandates. Identification of projects needed to comply with federal Clean Water Act and federal Safe Drinking Water requirements with an estimate of funding, and fund sources, likely to be available. Drinking water requirements might also require a more precise delineation of wellhead protection areas, and the development of more precise water conservation policies.
- 4. <u>Service Standards</u>. Based on new information on costs and likely funding, the city may wish to revisit published service standards.
- 5. New Project List. All significant projects needed to support the Comprehensive Plan have must be amended into the official plan list. Project descriptions should be specific enough to tell that a funded project is actually a listed project.
- 6. <u>Aviation Facilities Map.</u> Depiction of airports, airport expansion areas, and heliports as public facilities.
- 7. Needed School Site Map. The 2007 Oregon Legislature amended ORS 195.110 to afford the City of Portland a limited role in School District facility planning. Under this authority the city and a "large" school district would jointly designate any "desirable school site" needed within the next ten years. If one or more sites were identified the city would amend its Comprehensive Plan to recognize the general location of future schools. The statute clearly makes the update of school facility plans subject to periodic review, but not their initial adoption. Nevertheless, the city believes it has sufficient discretion to process an initial adoption either as a post-acknowledgement plan amendment or a periodic review task.

Updated Urbanization Element

As described in the Economic and Housing sections above, Metro fulfills many of the state urbanization obligations that would have fallen to Portland if it were a "stand alone" city not sharing an urban growth boundary with any other municipalities. Metro forecasts 20-year population and employment growth for the entire region, derives a housing unit need from population, then apportions the total regional housing and employment needs to Portland, 25 other cities, and unincorporated urban and urbanizing areas in three counties. Portland is obligated to demonstrate capacity to accommodate at least its apportioned share, but has wide discretion on how, when, and where to accommodate identified need. It also has the discretion to exceed regional minimums

How, how much, when, and where the city grows (and the areas the city chooses to shield from future development), is what the state calls "urbanization." Portland's existing Comprehensive Plan suffers from the absence of a discrete urbanization component, and a practice of trying to describe in written plan policy what might be better depicted in maps, drawings, or diagrams. The Comprehensive Plan Map probably presents the clearest description of a desired future settlement pattern by depicting allowed uses, and in some cases, intensity of use. The city's zoning map and code are required to conform to the Comprehensive Plan map.

Statewide Planning Goal 2 – Planning requires a consideration of alternatives for accommodation of anticipated growth, and this obligation might be best fulfilled by presenting alternative scenarios (different patterns of growth and development, location, mix, intensity) describing the costs, advantages, and disadvantages of each.

Indicated Work Includes:

- Scope: An evaluation of information on hand, existing conditions, trends, and the
 identification additional information needed to make a good decision (also called evaluation
 criteria). The impact method described for the transportation update would be one example
 of an evaluation criterion. Other criteria would be based on community values discerned
 through the VisionPDX project. These values include community connectedness and
 community distinctiveness, equity and accessibility, and sustainability.
- 2. <u>Alternatives</u>. Consideration of alternative ways to accommodate anticipated employment and housing needs. One of these alternatives will be a "base case" that depicts a probable build-out of the existing plan.
- 3. <u>Decision</u>. Selection of a preferred alternative, and revision of the Comprehensive Plan Map (physical development plan) to reflect this decision.
- 4. <u>Implementation</u>. Adjust the zoning map, codes, and other implementing measures, to conform to the new Comprehensive Plan map.

Part Two: The Work Program

TASK I – Community Involvement

Task Overview

Meaningful, timely, and sufficient community participation in all phases of plan update.

Subtask A – Appoint Community Involvement Advisory Committee

Committee with consist of three members of the City Planning Commission and at least nine others members nominated by the Mayor and confirmed by the Portland City Council.

Subtask B – Establish Standards and Practices

The Committee will review Public Engagement Program (Exhibit B of the Resolution) to ensure it contains sufficient and appropriate standards and practices. Needed improvements will be recommended to City Council as possible amendments to the Periodic Review work program.

Subtask C – Monitoring and Evaluation

The committee will meet quarterly and advise the Planning Bureau and Commission on the proper application of standards and practices. Needed improvements will be recommended to City Council.

Subtask D – Plan and Code Recommendations

The committee should review Goal 9 (Citizen Involvement) and Goal 10 (Administration) of the Portland Comprehensive Plan, and the "Legislative Procedures" Chapter of the City Zoning Code (Title 33) and recommendations for beneficial changes.

TASK II - Inventory and Analysis

Task Overview

Research and analysis necessary to provide a solid factual base for plan updates

Subtask A – Characterization of Existing Land Supply

An inventory will be constructed in three parts: constrained, highly constrained, and unconstrained.

1. Constrained Lands

Development is allowed on constrained lands, but with added scrutiny. The Constrained Lands inventory will be constructed from the best available, parcel specific information on the following:

- Infrastructure Limitations Areas where an existing transportation, water, sewer, or drainage feature may be insufficient to support current plan designations
- Airport Conflicts Areas where building use and height must be limited near Portland International Airport because of aircraft approaches or departures, aircraft noise, or safety concerns.
- Heliport Conflicts Areas where building height must be limited near the Portland Heliport.

- Significant Natural Resources Streams, lakes, riparian areas, forests, fish and wildlife habitats, scenic views, sites and corridors, groundwater recharge areas, designated open space, and three delineated wellhead protection areas -Columbia South Shore, Vivian, and Gilbert.
- Significant Cultural Resources Historic districts, buildings, and sites; archeological sites; and areas subject to consultation with Native American tribal governments
- Landslide Hazards Areas of historic failures; areas of unstable, old and recent landslides; and all slopes over 25%. Hazards will be identified from the best available topographic maps, and the following information from the Oregon Department of Geology and Mineral Industries, should this information become available at a parcel-specific scale: Statewide Digital Landslide Database (SLIDO), and Rapidly Moving Landslide Hazard Zones (IMS-22).
- Earthquake Hazards Fault lines, areas subject to liquefaction, and areas subject to moderate or severe damage from earthquakes should Department of Geology and Mineral Industries databases IMS-1 and IMS-16 information become available at a parcel-specific scale.
- Floodplains and other Areas Subject to Flooding Areas identified from Federal Emergency Management Agency 100 year flood maps, 1996 actual flooding, areas with impervious soils or other drainage problems, and areas with shallow ground water.
- Contaminated Areas Areas identified by the Oregon Department of Environmental Quality from the following sources: Environmental Cleanup Sites I (ECSI), Confirmed Release Sites (CRL) and Underground Storage Tank Cleanup Sites (UST), should this information become available on a parcel-specific basis.

2. Highly Constrained Lands

Urban level development is rarely allowed on highly constrained lands, but provisions are often made to transfer development opportunity to less constrained sites. The highly constrained lands inventory will be composed of the following.

- Publicly Owned Land Those publicly owned or controlled lands that do not provide for employment or residential uses. Examples include parks, rights-ofway, and the beds and banks of navigable waterways.
- Floodways Areas mapped as floodways by the Federal Emergency Management Agency.
- Conserved Land designated environmental protection areas; and land benefiting from farm, forest, or open space tax deferral programs.
- Rural lands Lands that are both not within the regional urban growth boundary and not designated as urban reserves by Metro.

3. Unconstrained Lands

These are lands not falling within the previous two categories. This is the "Buildable Lands" inventory within the meaning of Statewide Planning Goal 9 (Economy) and Goal 10. The city will not employ this term because it engenders too much confusion, particularly the assumption that land not so inventoried is not buildable; thus the synonym "Unconstrained Lands" inventory.

Subtask B – Estimate of Remaining Development Potential

Remaining development potentials for housing and employment will be calculated from the existing Comprehensive Plan Map. This will involve the establishment of a standard set of justifiable assumptions for different categories of urban land, particularly for areas were infill development or redevelopment is likely. The spatial distribution of existing and potential development will inform a "base case" for an alternatives analysis.

Subtask C – Coordination of Population and Employment Forecast

Portland will begin periodic review without a current regional population forecast, or identified 20-year housing and employment needs. The beginning assumption is that Portland needs to accommodate at least its 2002 Metro allocation of jobs and housing, plus an added increment. Portland will work with Metro during periodic review and will recognize the new regional forecasts and allocations when they become available. An important part of this effort will be working with Metro to refine modeling assumptions to better estimate Portland's remaining development potential.

Subtask D – Identification of Employment Needs

Future needs and opportunities will be examined and compared to existing conditions.

- 1. A new Economic Opportunities Analysis will be prepared. This analysis will describe international, national, state and local economic trends related to the types of business likely to locate or expand in Portland.
- 2. The city will also reexamine the adequacy of its existing industrial land base, identity "prime" industrial land, and characterize long and short supplies of industrial land suitable for different employment types in the city's various employment districts.
- 3. Portland will also assess the adequacy of its land base for non-industrial employment. Land supply and demand analyses will consider urban centers, main streets and corridors, commercially underserved neighborhoods, and institutional land needs (e.g., schools, hospitals and universities).
- 4. The amounts of employment land of the constrained and unconstrained inventories will be identified.

Subtask E – Identification of Housing Needs

Existing and expected housing stock will be characterized by type and affordability.

1. Portland will recognize Metro's new population forecast, housing urban growth report, and allocation of regional housing potential.

- 2. Portland will perform a "needed housing" examination, profiling existing and expected residents and the amount of housing affordable for different brackets of household income. Expected surpluses and deficiencies in different housing types and affordability ranges will be identified. The residentially zoned part of the unconstrained inventory will be checked to determine whether it contains the potential of 10-units per acre, and whether half the reaming potential is for multi-dwelling and attached single dwelling structures.
- 3. The city will also examine housing the city's total housing potential lost or gained since the last Periodic Review, particularly the supply of more affordable housing. Amounts of housing land on the constrained and unconstrained inventories will be identified.
- 4. The city will identify any provisions in its zoning and other codes that might serve as barriers to the provision of identified forms of needed housing. An example of one such form might be courtyard housing designed for families with young and schoolaged children.

Task III - Consideration of Alternatives

Task Overview

The city will identify the consequences of alternative patterns of development. Development patterns will be depicted by use, intensity, and form.

Subtask A – Develop Evaluation Criteria

Evaluation criteria will include the state requirements for the examination of the economic, social, environmental, and energy consequences of different choices. Examples of measured consequences would include trip generation potential by mode and potential changes in housing costs. Additional evaluation criteria will be derived from community values identified through the VisionPDX project.

Subtask B – Thematic Alternatives

Simplified consequence analysis will be applied to different patterns of urban development. Alternative will be designed to emphasize particular community values. There will be several of these.

Subtask C- Detailed Alternatives

Detailed consequence analysis will be applied to a base case derived from a probable build-out of the Comprehensive Existing plan, and at least three other alternatives - each trying to achieve an optimum mix of community values.

Task IV - Policy Choices

Task Overview

Policy choices are decisions informed by the alternatives analyses. They must be recommended by the Planning Commission and adopted by City Council ordinance. This task description is fairly general because it attempts to describe only plausible decisions. The actual decisions must be based on the yet to be completed preliminary work described in Tasks II and III above.

Subtask A – Physical Plan

A new plan for the physical development of the city will replace the existing Comprehensive Plan map. This plan might be form-based, use-based, or employ a combination of both approaches. All other periodic review policy choices should be derived from or supportive of the future development pattern depicted on the physical plan.

Subtask B – Economy

- 1. The city will adopt long-term policies and shorter-term strategies for economic development.
- 2. Different types of employment districts may be established.
- 3. Sufficient vacant, partially developed, and re-developable land will be identified to meet expected employment needs.

Subtask C – Housing

- 1. The city will adopt long-term policies and shorter-term strategies for meeting identified housing needs.
- 2. The city may revisit its "no net loss" housing policy or adopt alternative housing conservation policies, particularly policies aimed at the preserving the existing stock of affordable housing.
- 3. Sufficient vacant, partially developed, and re-developable land will be identified to meet expected employment needs.

Subtask D – Public Facilities

- 1. New facilities plans will be developed to meet service requirements of the physical plan.
- 2. Transportation, sewer, drainage, and water projects necessary to support future development will be identified and adopted as part of the plan.
- 3. The existing Portland International Airport, and any proposed airport expansion areas, will depicted as public facilities in the plan.
- 4. A decision will be made to either continue or discontinue operation of the Portland Heliport. If continued the heliport would be depicted in the plan.
- 5. Should one or more school districts complete facility planning during the course of periodic review, and should the city be requested by a school district, the city could depict the general location of desired future school sites in the plan.

Subtask D – Transportation

- 1. Conforming amendments to the city Transportation System Plan will be made for updates to the Regional Transportation Plan.
- 2. If authorized by the Regional Transportation Plan the city might adopt alternatives to the "Level of Service" standard for characterizing the adequacy of existing and proposed

transportation facilities. These alternatives might apply citywide or only within designated areas. In the absence of further state guidance the city might also adopt standard methods for examining the transportation effects for proposed intensifications or urban development.

3. The city might also consider a system of modal preferences or desired mode splits as part of its street classification scheme.

Task V - Implementation

Task Overview

What ever policy decisions are made, they must be carried out by sufficiently robust implementation measures. It is important to emphasize that that not all these measures are regulatory. Funding an identified public works project is an example plan implementation, as are programs carried out by government to government or public private partnerships. Because policy decisions have yet to be made, the illustrative implementation measures are necessarily vague. Possible new implementation measures might include:

- 1. Retention measures for prime industrial land and affordable housing stock
- Adjustments to minimum residential density requirements, or application of minimum density requirements to mixed use development or residential development in nonresidential zones.
- 3. Form-based design standards
- 4. Construction of addition streetcar lines
- 5. Interagency agreements with special districts
- 6. Establishment of new urban renewal areas
- 7. Standard method for estimating traffic generation potential of proposed plan amendments
- 8. New community involvement and outreach programs
- 9. Inter-bureau strategies to carry out plan objectives
- 10. Adjustment of height, noise, and use limitations around airport